

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

M.J. No.: 04-817-MBB

ADAM ELLARD
WILLIE HESTER
TAVON ROBINSON
STEVEN TUCKER
NORMAN BARNES
(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about April 12, 2004 in Suffolk County in the District of Massachusetts, defendants did, (Track Statutory Language of Offense)

knowingly and intentionally combine, conspire, confederate, and agree with each other to distribute cocaine base, a Schedule II controlled substance

in violation of Title 21 United States Code, Section 846.

I further state that I am a(n) DEA Special Agent
Official Title

and that this complaint is based on the following facts:

See Affidavit of DEA Special Agent Steven C. Story attached hereto and incorporated by reference herein

Continued on the attached sheet and made a part hereof: [x] Yes [] No

Steven C. Story
Signature of Complainant
Steven C. Story
DEA Special Agent

Sworn to before me and subscribed in my presence,

April 13, 2004 @ 3:05PM at
Date

Boston, Massachusetts
City and State

MARIANNE B. BOWLER
Chief U.S. Magistrate Judge
Name and Title of Judicial Officer

Marianne B. Bowler, USMJ
Signature of Judicial Officer